

***Remarks***

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendments, claims 24-41 are pending in the application, with claim 24 being the independent claim. New claims 42-44 are sought to be added. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

***Rejections under 35 U.S.C. § 103***

**Leung, Gunter, and Chang**

In the Office Action, claims 24-26, 28-32, and 36-41 were rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Leung, U.S. Patent 6,760,444 (Leung), in view of Gunter, et al, U.S. Patent 6,751,728 (Gunter), and further in view of Chang, et al, U.S. Patent 6,862,278 (Chang). Applicants respectfully traverse this rejection.

To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the references. *In re Royka*, 490 F.2d 981 (CCPA 1974). Applicants submit that the combination of Leung, Gunter, and Chang does not teach or suggest each and every element of Applicants' amended independent claim 24.

Leung describes a system and method for authenticating a roaming mobile node during Mobile IP registration. (Leung, Abstract). In a mobile IP environment, in order for a roaming mobile node (now coupled to a Foreign Agent) to successfully

receive messages, the roaming mobile node must register with its Home Agent. (Leung, col. 2, lines 46). In Leung, during the registration process, the mobile node "constructs a registration request message including an authenticator" and sends the request to the Home Agent over a network 504. (Leung, col. 8, lines 26-29). The Home Agent then determines the server handling the security association for the roaming mobile node and sends a packet containing the request to the server over a network. (Leung, col. 8, lines 29-50).

The server in Leung receives the packet identifying the mobile node, obtains the security association information for the mobile node identified in the packet, and sends the security association to the Home Agent over the network for authentication of the mobile node. (Leung, col. 7, lines 33-40). The server in Leung may also perform authentication processing using the security association and send a reply to the home agent indicating the status of the authentication. (Leung, col. 8, lines 51-66).

Nowhere does Leung teach or suggest "a distributor unit in the device that distributes a plurality of packets and a first set of security association information for each of the plurality of packets according to a distribution scheme and updates a second set of security association information for one or more of the plurality of packets," as recited in independent claim 24. This deficiency of Leung is not in any way remedied by Gunter or Chang.

In the Office Action, the Examiner acknowledges that "Leung does not teach a plurality of security processing engines in the device, coupled to the distributor unit, that perform authentication and cryptographic functions" and consequently does not teach or suggest that a plurality of security processing engines process a plurality of

packets in parallel. (Office Action, p. 3). However, the Examiner alleges that the combination of Gunter and Chang teach these missing limitations.

In Gunter, after a receiving host receives a packet, the host first decrypts the packet and then authenticates it. (Gunter, col. 8, lines 64-65). Thus, the processing described by Gunter occurs sequentially on a single packet. Furthermore, nowhere does Gunter describe that the decryption and authentication are being performed by different security processing engines. Accordingly, Gunter does not teach or suggest "a plurality of security processing engines in the device, coupled to the distributor unit, configurable to perform authentication, encryption, or decryption functions, wherein each of the plurality of security processing engines receives a packet and at least a portion of the first set of security association information associated with the packet, and wherein the plurality of security processing engines process the plurality of packets in parallel," as recited in amended independent claim 24.

Chang describes a "system and method for parallel compression and decompression of a bit stream." (Chang, Abstract). In the Office Action, the Examiner appears to be equating the parallel compression by multiple encode units and decompression of a bit stream by multiple decode units to the parallel processing of a plurality of packets by the security processing engines in Applicants' claim 24. However, nowhere does Chang teach or suggest that the encode and/or decode units are "configurable to perform authentication, encryption, or decryption functions." Furthermore, in Chang, the encode or decode units do not receive security association information.

Accordingly, Chang also does not teach or suggest "a plurality of security processing engines in the device, coupled to the distributor unit, configurable to

perform authentication, encryption, or decryption functions, wherein each of the plurality of security processing engines receives a packet and at least a portion of the first set of security association information associated with the packet, and wherein the plurality of security processing engines process the plurality of packets in parallel," as recited in amended independent claim 24.

Based on the above, Applicants submit that the combination of Leung, Gunter, and Chang does not teach or suggest every feature recited in Applicants' amended independent claim 24. Therefore, Applicants request favorable consideration of amended independent claim 24. For at least these reasons, and further in view of their own features, claims 25, 26, 28-32, and 36-41 which depend from claim 24, respectively, are patentable over the combination of Leung, Gunter, and Chang. Reconsideration and withdrawal of the ground of rejection is therefore respectfully requested.

Leung, Gunter, Chang, Barlow

In the Office Action, claim 27 was rejected under 35 U.S.C. §103(a) as being anticipated by Leung, Gunter, Chang in view of Barlow, *et al.*, U.S. Patent No. 6,038,551 (Barlow). Applicants respectfully traverse this rejection.

Claim 27 depends from claim 24. Barlow does not overcome all of the deficiencies of the combination of Leung, Gunter, and Chang relative to claim 24 described above. For at least these reasons, and further in view of its own features, claim 27 is patentable over the combination of Leung, Gunter, Chang, and Barlow. Reconsideration and withdrawal of these grounds of rejection are therefore respectfully requested.

Leung, Gunter, Chang, Robinson

In the Office Action, claim 33 was rejected under 35 U.S.C. §103(a) as being anticipated by Leung, Gunter, Chang in view of Robinson, U.S. Patent 5,734,829 (Robinson). Applicants respectfully traverse this rejection.

Claim 33 depends from claim 24. Robinson does not overcome all of the deficiencies of the combination of Leung, Gunter, and Chang relative to claim 24 described above. For at least these reasons, and further in view of its own features, claim 33 is patentable over the combination of Leung, Gunter, Chang, and Robinson. Reconsideration and withdrawal of these grounds of rejection are therefore respectfully requested.

Leung, Gunter, Chang, Martin

In the Office Action, claims 34-35 were rejected under 35 U.S.C. §103(a) as being anticipated by Leung, Gunter, Chang in view of Martin, U.S. Patent 5,867,706 (Martin). Applicants respectfully traverse this rejection.

Claims 34 and 35 depend from claim 24. Martin does not overcome all of the deficiencies of the combination of Leung, Gunter, and Chang relative to claim 24 described above. For at least these reasons, and further in view of their own features, claims 34 and 35 are patentable over the combination of Leung, Gunter, Chang, and Martin. Reconsideration and withdrawal of these grounds of rejection are therefore respectfully requested.

***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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